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2,4,5-T

It has now been over a year since EPA announced its emergency suspension and intent to cancel certain uses (including all forestry uses) of 2,4,5-T and silvex. Since the announcement, arguments, pro and con, have been heating up in preparation for the cancellation hearings scheduled to begin on March 11.

Under heavy attack has been the Alsea II study which initiated EPA's suspension action in the first place. According to Dow Chemical Company, the study "has been thoroughly discredited in every scientific review conducted since its surprise publication in March, 1979". EPA's own admission that the Alsea II study data are faulty give credence to Dow's claim. However, EPA says that the Alsea study "was only one element in a decision that rests on a number of other factors."

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EPA reported that of 103 mothers' milk samples, taken from 2,4,5-T spray areas in California, Oregon, and Washington in 1977, all were negative for dioxin. The agency added later that the significance of this information is questionable.

In another communication, EPA announced that data from five separate Swedish studies associate human cancer with "occupational" exposure (including forestry) to 2,4,5-T. The agency said nothing about the significance of this information.

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The White House established an interagency task force to determine if there are any long term health effects associated with exposure to "the dioxins" - meaning the phenoxy herbicides. Although the task force was formed largely because of concern about exposure of Vietnam veterans to Agent Orange while serving in Vietnam, epidemiological studies will be made of chemical workers, agricultural workers, and forest workers.

PESTICIDE MISUSE PROBLEMS?

Another service of State and Private Forestry (S&PF) is making technical label reviews of pesticides proposed for use by state and private individuals. This means that, on request, S&PF will look at any proposed use of a pesticide, compare it with the label, and comment on its legal and technical merits. This activity is routinely conducted for state nurseries in conjunction with Federal/State cooperative programs.

S&PF examined 80 pesticide proposals submitted by State nurseries for use in 1980. Of these, 9 were found to be in the misuse category (7 were not registered for use on a nursery site and 2 were proposed for use at the wrong rate of application). These figures indicate the possible existence of a problem. If the indication is correct, examination of the "proposed misuses" should shed some light on the nature of the problem.

Below is a list of active ingredients and a corresponding list of products which were incorrectly proposed for use on a nursery site. These are compared with other products legally registered for nursery use.

Active Ingredient	Proposed For Nursery Site (Trade Name & EPA No.)	OK For Nursery Site (Trade Name & EPA No.)
methyl bromide + chloro-picrin	Pestmaster (876-258)	Dowfume MC2 (464-104) Dowfume MC33 (464-303)
maneb + zinc	Dithane M22 (707-83) Manzate 200 (352-341)	Dithane M45 (707-78) Manzate D (352-291)
trifuralin	Treflan EC (1471-35)	Treflan EC (1471-65)

From the list you will see that there are several products for each active ingredient and that some of these products have the same or similar trade names and formulations. Such similarities lead to confusion when selections or purchases are based solely on active ingredient or trade name. On the other hand, note that each product has a unique EPA Registration Number. Therefore to avoid problems, insist that all selections and purchases be based upon the EPA number.

One sure way to avoid misuse problems is to: read the label prior to purchase; select the product label registered for your site; order the product by EPA Registration No.; and follow label directions at time of use.

AGRO-TOXIC WORDS

Recently, in an agricultural magazine, Dr. Winand Hock, Extension Pesticide Specialist, Pennsylvania State University, discussed pesticide toxicology and how the language of the toxicologist belongs to the agriculturist as well.

Dr. Hock said that ever since the EPA started to assess the risks and benefits of many of our commonly used pesticide products, terms such as carcinogenic, teratogenic, mutagenic, to mention a few, have appeared in the popular press including newspapers and many agricultural publications. "These terms, once restricted to the medical profession and its allied disciplines, are now becoming a part of the vocabulary of agriculture, and it is important that we understand this language."

You may wish to become familiar with some of the more common terms mentioned by Dr. Hock.

oncogenic	--capable of producing tumors, either benign or malignant.
benign	--noncancerous, as in the case of tumors.
malignant	--cancerous, as in the case of tumors.
carcinogenic	--capable of inducing cancer.
hepatic	--referring to the liver.
teratogenic	--capable of producing birth defects, malformations in the unborn.
fetotoxic	--substance capable of killing or retarding the development of a fetus, but not necessarily causing deformities.
mutagenic	--capable of causing genetic changes or mutations; these changes manifest themselves in the offspring.
hemotoxic	--causing blood disorders.
neurotoxic	--causing disorders of the nervous system.

ORTHENE^R O.K. FOR MAINE SPRUCE BUDWORM PROGRAM

Orthene^R would be especially useful near fish-bearing streams... With this, EPA reversed its earlier recommendation that acephate not be used in the 1980 Maine Spruce Budworm Spray Program. Apparently a report that Orthene^R presents a hazard to birds could not be substantiated.

FERTILIZER !!!

If you submit a proposal in time to EPA, the agency might pay you 4 million dollars for taking 30 million pounds of lawn fertilizer off their hands. This mountain of fertilizer contains the voluntarily cancelled herbicide, silvex. Unfortunately it cannot be used for its intended purpose and you'll have to find a suitable place and means for its disposal.

REPORTS AND PUBLICATIONS

Council for Agricultural Science and Technology (CAST) Report No. 81, December 1979. This report was produced in response to the Public Broadcasting System's NOVA program titled "A Plague on our Children". The program was broadcast nationally on October 2, 1979 and focused on 2,4,5-T and TCDD. The CAST report is a critical commentary on the program content and provides a brief review of some important educational opportunities overlooked by NOVA.

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Dow Chemical Company's Pretrial Risk Brief. - This 60 page document was filed January 25 with the US EPA as a part of the current pretrial hearing process on 2,4,5-T and silvex. The report is a concise summary of the regulatory history and scientific facts about the risks of using the two herbicides.

These reports provide excellent background information and insight into the nature of the controversy. Environmental Quality Evaluation Staff, in Broomall, can provide information about obtaining copies.

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